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*United Parcel Service, Inc.*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JOHN WILLOUGHBY, an individual, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 UNITED PARCEL SERVICES, INC., a )  
 foreign corporation; EMPLOYEES(S) )  
 AGENT DOES through V, inclusive; )  
 and ROE ENTITIES through v, )  
 inclusive, )  
 )  
 Defendants. )

CASE NO. 2:16-cv-00140-JAD-CWH

**STIPULATED APPLICATION TO  
EXTEND TIME FIXED  
FOR HEARING**

**[FIRST REQUEST]**

In accordance with LR IA 6-1, Plaintiff John Willoughby (“Plaintiff”) and Defendant United Parcel Service, Inc. (“Defendant” or “UPS” collectively “Parties”) by and through their respective counsel of record, hereby stipulate to and request that the Court continue the hearing on Defendant’s Motion for Sanctions currently scheduled for September 15, 2016. This is the parties’ first request for an extension of this deadline. As grounds for this application, the parties state as follows:

**I. REASON FOR EXTENSION**

On Friday, September 9, 2016, the Court issued a Minute Order setting the hearing on Defendant’s Motion for Sanctions for September 15, 2016. Each of Defendant’s counsel of record will be unavailable on September 15, 2016 due to a previously scheduled event.

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**II. SUGGESTED HEARING DATES**

The Parties are available and propose September 23 for the hearing.

Respectfully Submitted,

LAW OFFICES OF STEVEN J. PARSONS

/s/ Andrew L. Rempfer

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UNITED PARCEL SERVICE, INC.

The court is unable to accommodate the date the parties request. IT IS THEREFORE ORDERED that the motion hearing is RESET for Monday, September 26, 2016, at 9:00 a.m. in Courtroom 3C.

  
UNITED STATES MAGISTRATE JUDGE

DATED: September 13, 2016